

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

AR RAZZAAQ RASHID BEY

Plaintiff,

v.

TYLER O. MOORE, *et. al.*

Defendants.

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No. 1:20-cv-03200-JRS-MPB

**DEFENDANT ALLEN WILSON AND COMPETITION TOWING & RECOVERY
MOTION TO DISMISS**

Defendants, Allen Wilson and Competition Towing & Recovery, LLC, by counsel, Jeff Cardella, move to dismiss Plaintiff's Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6). In support of this motion, Defendant states as follows:

1. Plaintiff has failed to state a claim upon which relief can be granted.
2. Plaintiff has alleged that the Defendants failed to respond to an affidavit of truth.
3. Plaintiff has concluded – without alleging facts – that he was charged ransom.
4. This is insufficient to allow a claim to proceed.
5. A memorandum in support of this motion is being filed contemporaneously.

WHEREFORE, Defendants Allen Wilson and Competition Towing & Recovery, LLC, respectfully ask that this Court dismiss Plaintiff's Complaint, and for any other relief that is just and proper.

/s/ Jeff Cardella

Jeff Cardella - Atty. No. 27051-49
The Law Office of Jeff Cardella, LLC
333 N. Alabama St. # 357
Indianapolis, IN 46204
Phone: (317) 695-7700
Fax: (317) 454-1334

Email: jeffcardella@cardellalawoffice.com
Web: www.cardellalawoffice.com

CERTIFICATE OF SERVICE

I hereby certify that on January 18 of 2021, a copy of the foregoing pleading was filed electronically by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I also certify that a copy of the foregoing was sent by US mail, postage prepaid, to:

Ar Razzaq Rashid Bey
1524 North Purdum Street
Kokomo, IN 46901

/s/ Jeff Cardella
Jeff Cardella